

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 1:18CR139
)	
Plaintiff)	JUDGE PATRICIA A. GAUGHAN
)	
vs.)	
)	
PATRICK DIPIETRO,)	<u>MOTION TO EXTEND THE TIME IN</u>
)	<u>WHICH TO FILE OBJECTIONS TO</u>
Defendant)	<u>THE PRESENTENCE REPORT</u>
)	

Now comes the Defendant, Patrick DiPietro, by and through undersigned counsel, and respectfully requests an extension of time until September 5, 2018 in which to file objections to the Presentence Report. A Memorandum in Support is attached hereto.

Respectfully submitted,

s/Roger M. Synenberg
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CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2018, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular US mail. Parties may access this filing through the Court's system.

s/Roger M. Synenberg
ROGER M. SYNENBERG

MEMORANDUM

Undersigned counsel received the Presentence Investigation Report in this matter on or about August 13, 2018. Objections are due to the Probation Officer by August 27, 2018. Sentencing in this matter is scheduled for September 12, 2018.

Due to the press of business, a long planned vacation, and unexpected recommendations from the Probation Department, counsel has had insufficient time to properly respond to the Presentence Report in this matter.

Defense counsel is requesting additional time to research and respond to the Presentence Report. Counsel for Mr. DiPietro is requesting an extension of time until September 5, 2018 in which to file objections to the Presentence Report.

This request is made in good faith and not for purposes of delay.

WHEREFORE, Defendant Patrick DiPietro respectfully requests that an extension of time be granted until September 5, 2018 in which to file objections to the Presentence Investigation Report.

Respectfully submitted,

s/Roger M. Synenberg
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